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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 RENEE JENKINS, an Individual,
13 Plaintiff,

14 v.
15 PRIME WASHINGTON, LLC, d/b/a
16 CORNERSTONE CROSSINGS
17 APARTMENTS, a Delaware limited
18 liability company; PRIME
19 ADMINISTRATION, LLC, d/b/a PRIME
20 GROUP, a Delaware limited liability
21 company; PAULETTA DEARINGER, an
22 individual; ROE PROPERTY
23 MANAGEMENT COMPANY; ROE
PROPERTY MANAGER; DOES I-X; and
ROE BUSINESS ENTITIES XI-XX,
inclusive,

24 Defendants.

CASE NO.: 2:20-CV-00653-JCM-DJA

25 **STIPULATION AND
ORDER] FOR EXTENSION OF
TIME TO FILE A REPLY IN
SUPPORT OF PLAINTIFF RENEE
JENKINS'S MOTION TO REMAND**
(First Request)

26 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff RENEE
27 JENKINS, through her counsel of record, Dennis M. Prince, Kevin T. Strong, and Angela
M. Lee of PRINCE LAW GROUP, and Defendants PRIME WASHINGTON, LLC, d/b/a



1 CORNERSTONE CROSSINGS APARTMENTS, PRIME ADMINISTRATION, LLC,
2 d/b/a PRIME GROUP, and PAULETTA DEARINGER, by and through their counsel of
3 record, Rachel J. Holzer and Thomas McGrath of TYSON & MENDES LLP, that the
4 deadline for Plaintiff to file her Reply in Support of Plaintiff Renee Jenkins's Motion to
5 Remand (ECF No. 23) shall be extended by seven (7) days, from May 29, 2020 to June
6 5, 2020. Plaintiff's Motion to Remand was filed on May 7, 2020. Th
7 stipulation for extension of time to file Plaintiff's Reply in Support of Plaintiff Renee
8 Jenkins's Motion to Remand. This Stipulation and [Proposed Order] is submitted in
9 accordance with LR IA 6-1.

10 Good cause exists to grant the parties' stipulation. There are complex procedural
11 matters that require additional time to appropriately reply to Defendant's Opposition.
12 This additional time will provide the Plaintiff more time to fully and properly apprise
13 the Court of the legal issues in this matter. There are currently no scheduled hearings
14 in this case. A short extension to file an opposition will not unduly delay the
15 proceedings, nor adversely affect or prejudice the parties. This request is not being
16 made in bad faith, but to allow Plaintiff's counsel time to properly respond to
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1 Defendants' Opposition. Therefore, the parties respectfully request this Court to
2 approve the foregoing stipulation.

3 DATED this 29th day of May, 2020.

4 DATED this 29th day of May, 2020

5 **PRINCE LAW GROUP**

TYSON & MENDES, LLP

6 */s/ Dennis M. Prince*
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10 Attorneys for Defendants

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ORDER

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IT IS SO ORDERED.

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DATED May 29, 2020.

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Xeum C. Mahan
UNITED STATES DISTRICT JUDGE

